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5 Attorneys for Putative Partner of Alleged Debtor  
Alexander Sabadash  
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8 UNITED STATES BANKRUPTCY COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
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11 In re:  
12 Itkin & Sabadash,  
13 Debtor,  
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No. 2:25-bk-11235-NB

Hon. Neil W. Bason

**REQUEST FOR JUDICIAL  
NOTICE IN SUPPORT OF  
PUTATIVE PARTNER  
ALEXANDER SABADASH'S  
MOTION FOR FEES, DAMAGES,  
AND SANCTIONS**

Hearing Date: August 5, 2025  
Hearing Time: 11:00 a.m.  
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Aleksandr Sabadash submits his Request for Judicial Notice in support of his Motion for fees, damages, and sanctions. Mr. Sabadash asks the Court to take judicial notice of the following documents:

1. Declaration of Alexander Sabadash dated April 19, 2018 filed in Case No. BC647351. A true and correct copy of the declaration is attached to the Declaration of Michael Zorkin as **Exhibit 2**.

2. Declaration of Alexander Sabadash dated December 19, 2019 filed in Case No. BC647351. A true and correct copy of the declaration is attached to the Declaration of Michael Zorkin as **Exhibit 3**.

3. Declaration of Larisa Sabadash dated January 9, 2020 filed in Case No. BC647351. A true and correct copy of the declaration is attached to the Declaration of Michael Zorkin as **Exhibit 4**.

4. Alexander Sabadash's Answer to Garry Itkin's Cross-Complaint filed in Case No. BC647351. A true and correct copy of the Answer is attached to the Declaration of Michael Zorkin as **Exhibit 5**.

5. Aug. 25, 2021 Ruling by private arbitrator Knyazev dismissing the arbitration titled *Davilla Investing Limited v. Golden Spirits Limited, AFB Trading One, Inc., and Golden Sphinx Limited* for lack of jurisdiction. A true and correct copy of the ruling and a certified translation is attached to the declaration of Michael Zorkin as **Exhibit 22**.

6. Garry Itkin's Motion for Summary Adjudication filed in case no. BC647351. A true and correct copy of Itkin's motion is attached the declaration of Michael Zorkin as **Exhibit 25**.

7. Feb. 27, 2020 Order denying Itkin's motion for summary judgment. A true and correct copy of the order denying Itkin's motion is attached the declaration of Michael Zorkin as **Exhibit 26**.

Judicial notice is properly taken of facts that can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. Federal

1 Rules of Evidence 201(b)(2). A court may take judicial notice of records of other  
2 courts. *See Abbas v. Vertical Entertainment*, 2019 WL 6482229, at 1 (C.D. Cal. Aug.  
3 19, 2019).

4 Judicial notice of the above records is proper to establish that there was a  
5 bona fide dispute as to the existence of the partnership and thus the existence of the  
6 debt and that the involuntary petition was filed in bad faith.

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8 Dated: July 1, 2025

**THE ZORKIN FIRM**

9 By: /s/ Michael Zorkin

10 Counsel to Putative Partner Alexander  
11 Sabadash  
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